

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

Amanda A. Andrews  
58 Grande Lake Drive, #1  
Port Clinton, OH 43452

Plaintiff,

v.

Securus Technologies, LLC  
4000 International Pkwy.  
Carrollton, TX, 75007-1913

and

Wyandot County Sheriff's Department  
25 E Wyandot Ave,  
Upper Sandusky, OH 43351

and

Wyandot County Commissioners  
109 S Sandusky Ave # 10  
Upper Sandusky, OH 43351

and

Bridget A. Andrews  
53 E. Elm St.  
Washington Court House, OH 43160

and

John Does 1-5

Defendants.

) Case No \_\_\_\_\_

)

)

) Hon \_\_\_\_\_

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) **COMPLAINT WITH JURY**

) **DEMAND**

)

) Richard M. Kerger (0015864)

) Kimberly A. Conklin, (0074726)

) THE KERGER LAW FIRM, LLC

) 4159 N. Holland-Sylvania Rd. Suite 101

) Toledo, Ohio 43623

) Telephone: (419) 255-5990

) Fax: (419) 255-5997

) Email: [rkerger@kergerlaw.com](mailto:rkerger@kergerlaw.com)

) [kconklin@kergerlaw.com](mailto:kconklin@kergerlaw.com)

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) *Counsel for Plaintiff*

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Now comes Plaintiff and brings this action pursuant to 42 USC §1983 to obtain relief for violations of her civil rights carried out when she was in custody in the Wyandot County Jail. The assurance of the confidentiality of her right to confidential communications over the jail's communication system. She has suffered serious psychological harm as a result of the disclosure of such communications to her family and friends. It has also damaged her reputation as an attorney and caused her difficulties with regard to pending criminal investigations.

1. Plaintiff is a resident of Ottawa County.
2. Securus Technologies, LLC is a company engaged in providing technological support to entities operating jails and other secure governmental facilities. In particular, Securus provided the phone service for the Wyandot County Jail at all times Plaintiff was confined in that institution.
3. Wyandot County Sheriff's Department is the primary law enforcement entity for Wyandot County and provides management and training for persons employed at the Wyandot County Jail.
4. Wyandot County Commissioners are responsible for the management of all government operations in Wyandot County, including the Wyandot County Jail.
5. Defendant Bridget R. Andrews is a resident of Union County, Ohio and is the ex-spouse of Plaintiff.

6. John Does 1 through 5 are persons who acted in concert in order to assure the distribution unlawfully of Plaintiff's communications during her incarceration in the Wyandot County Jail.

7. This action is filed pursuant to 42 USCA §1983 seeking redress of injuries suffered by the Plaintiff for deprivation under color of state law of rights secured by the United States Constitution. Accordingly, jurisdiction is proper in this Court pursuant to 28 USCA §1331 and §1343(a)(3). This Court also has pendent jurisdiction of state law claims pursuant to 28 U.S.C § 1367.

8. Venue is proper in this Court pursuant to 28 USCA §1391 as Defendants reside in this District and each of the claims for relief arose here.

9. While in the Wyandot County Jail Plaintiff was assured that while her calls were being recorded for use by law enforcement, they would not be disclosed to third parties not associated with law enforcement.

10. In August 2020, following her release from the jail Plaintiff learned that most if not all of her calls had been distributed to a third party, specifically Bridget R. Andrews, the ex-wife of Plaintiff. She used those calls in connection with a custody battle pending in the Ottawa County Domestic Relations Court. But beyond that, she distributed them to countless friends and family of Plaintiff.

11. The disclosure of these conversations has caused Plaintiff serious harm with respect to relationships she established and valued deeply. Some of those relationships are damaged beyond repair. The disclosures were

intended to harm, threaten, embarrass and humiliate the Plaintiff, something that would have been known to all Defendants. They even became a factor in criminal charges brought against Defendant.

12. In addition to the significant psychological harm and devastating emotional fact, there was financial damage as well.

#### **FIRST CLAIM FOR RELIEF**

13. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 12 above, as if fully rewritten herein.

14. Defendant Securus did not adequately protect the recorded communications from being placed in the hands of third parties without prior court authorization. Any training provided by Securus was inadequate to assure the protection of Plaintiff's right to confidential communication.

#### **SECOND CLAIM FOR RELIEF**

15. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 14 above, as if fully rewritten herein.

16. Wyandot County Sheriff's Department did not provide adequate training and management for its employees who were thus able to turn over recordings previously assured to be confidential to third parties.

#### **THIRD CLAIM FOR RELIEF**

17. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 16 above, as if fully rewritten herein.

18. The Wyandot County Commissioners failed to adequately supervise and monitor the Wyandot County Sheriff's Department so as to assure confidential communications could not be taken and disclosed to others.

**FOURTH CLAIM FOR RELIEF**

19. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 18 above, as if fully rewritten herein.

20. The conduct of all Defendants was negligent with respect to the protection of Plaintiff's rights whereby Plaintiff has suffered serious psychological and financial harm.

WHEREFORE, Plaintiff prays judgment against Defendants, jointly and severally, in an amount exceeding \$25,000 in compensatory damages and for punitive damages in the amount three times the amount of compensatory damages, with an additional award of attorney fees and costs incurred in connection with this action.

Respectfully submitted,

RICHARD M. KERGER (0015864)  
KIMBERLY A. CONKLIN (0074726)

By: /s/ Richard M. Kerger  
*Counsel for Plaintiff*

THE KERGER LAW FIRM, LLC  
4159 N. Holland-Sylvania Rd. Suite 101  
Toledo, Ohio 43623  
Telephone: (419) 255-5990  
Fax: (419) 255-5997  
Email: [rkerger@kergerlaw.com](mailto:rkerger@kergerlaw.com)  
[kconklin@kergerlaw.com](mailto:kconklin@kergerlaw.com)

**JURY DEMAND**

Now comes the plaintiff and hereby demands a trial by jury of all issues herein properly raised.

/s/ Richard M. Kerger